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June 9, 2011

Via: ECF and FAX 718-613-2125

Honorable Ramon E. Reyes, Jr.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: TRITON SCHIFFAHRTS GMBH V. SEA SAFETY SERVICES, INC.
Venue: U.S. District Court, Eastern District of New York
Index No.: 11-cv-00850 (ENV) (RER)
Our File No.: 431-18948

Dear Judge Reyes:

We represent defendant Sea Safety Services, Inc., in the above-captioned admiralty matter. Per your Honor's Order of May 31, 2011, the settlement conference on this matter is set for **June 15, 2011 at 2:00 pm.**

We respectfully request Your Honor's permission for the representative of defendant's marine insurance company, Indemnity Insurance Company of North America, to participate in the settlement conference via telephone.

The representative of the marine insurance company is located in Wilmington, Delaware, and travel to attend the settlement conference will be a burden to this individual and the claims staff at the insurance company, which are in full swing now that it is boating season.

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Attending the conference in person will be the Operations Manager of defendant/insured, SEA SAFETY SERVICES, INC., with first hand knowledge of the events complained of and the counter-claim.

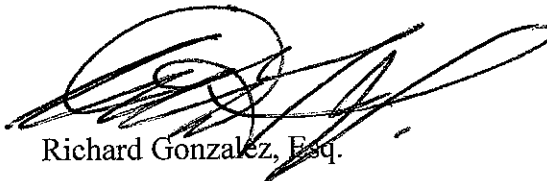
Plaintiff's counsel has consented to the defendant's representative being present and the insurer's representative attending by telephone.

Furthermore, the parties have agreed to the exchange of their respective Confidential Settlement Memorandums, and will be completing such by June 10, 2011.

We appreciate Your Honor's attention to this matter.

Respectfully,

RUBIN, FIORELLA & FRIEDMAN, LLP



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